

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

UNITED STATES OF AMERICA)	CR. NO.: 7:22-cr-00779-DCC
)	
vs.)	
)	
MARLON MICHAEL BRUFF,)	
a/k/a/ "Big Bro,")	
[REDACTED])	
RAMARO ALSWORTH HIGGINS,)	
a/k/a "Dre,")	
[REDACTED])	
LIONEL MARTIN ROSENDA CABALLERO,)	
a/k/a "Mr. Hustler,")	
[REDACTED])	
TRENT NICHOLS)	

GOVERNMENT'S BILL OF PARTICULARS
FOR FORFEITURE OF PROPERTY

The United States provides the following Bill of Particulars regarding property alleged in the Superseding Indictment ("Indictment"), filed December 13, 2022, as being subject to forfeiture to the United States.

NOTICE IS HEREBY GIVEN that upon conviction of any of the above Defendants for one or more felony violations of Title 18 and 21, United States Code, as charged in the Superseding Indictment filed December 13, 2022, the United States intends to seek the forfeiture of any and all property, real or personal, involved in, constituting, derived from, or traceable to the offense(s) of conviction, pursuant to 18 U.S.C. § 924(d)(1); 21 U.S.C. §§ 853 and 881; and 28 U.S.C. § 2461(c) or equivalent substitute assets pursuant to 21 U.S.C. § 853(p).

Such property includes, but is not limited to, the following:

UNITED STATES CURRENCY:

\$8,521.00 in United States Currency

Seized from Trent Nichols on December 19, 2022
Asset ID: 23-ATF-004856

Respectfully submitted,

ADAIR F. BOROUGHS
UNITED STATES ATTORNEY

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February 14, 2023